

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRAPHIC ARTS MUTUAL INS. CO.	:	CIVIL ACTION
	:	
v.	:	
	:	
LOWER MERION SCHOOL	:	
DISTRICT, ET AL.	:	NO. 2:10-cv-01707-JD

**ANSWER OF BALKE J. ROBBINS, A MINOR,  
BY HIS PARENTS AND NATURAL GUARDIANS,  
MICHAEL E. ROBBINS AND HOLLY S. ROBBINS**

Blake J. Robbins, a minor by his parents and natural guardians, Michael E. Robbins and Holly S. Robbins, by way of Answer to the Complaint of Graphic Arts Mutual Ins. Co. for Declaratory Judgment, aver as follows:

**I. PARTIES**

1. Denied. Answering defendants without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

2. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

3. Denied. Answering Defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

4. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

5. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

## **II. JURISDICTION AND VENUE**

6. Denied. The allegations contained herein are conclusions of law to which no responsive pleading is required, and therefore are deemed to be denied.

7. Denied. The allegations contained herein are conclusions of law to which no responsive pleading is required, and therefore are deemed to be denied.

8. Denied. The allegations contained herein are conclusions of law to which no responsive pleading is required, and therefore are deemed to be denied.

9. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore are deemed to be denied.

## **III. FACTS**

10. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

11. Admitted.

12. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

13. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

14. Denied. The allegations contained herein are conclusions of law to which no responsive pleading is required, and they are therefore deemed to be denied.

#### **IV. THE ROBBINS' COMPLAINT**

15. Denied. The Complaint referred to herein is a written document which speaks for itself, and Defendants deny Plaintiff's characterization thereof.

16. Denied. The Complaint referred to herein is a written document which speaks for itself, and Defendants deny Plaintiff's characterization thereof.

17. Denied. The Complaint referred to herein is a written document which speaks for itself, and Defendants deny Plaintiff's characterization thereof.

18. Denied. The Complaint referred to herein is a written document which speaks for itself, and Defendants deny Plaintiff's characterization thereof.

#### **V. THE POLICY PROVISIONS**

19. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

20. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

21. Denied. The Complaint referred to herein is a written document which speaks for itself, and answering Defendants deny Plaintiff's characterization thereof.

22. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

23. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

24. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

25. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

26. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

27. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

28. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

29. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

30. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

31. Denied. Answering defendants are without sufficient information to either admit or deny the allegations contained herein, and they are therefore deemed to be denied.

32. Denied. The allegations contained herein are conclusions of law to which no responsive pleading is required, and are therefore deemed to be denied.

WHEREFORE, Defendants, Blake J. Robbins, a minor, by his parents and natural guardians, Michael E. Robbins and Holly S. Robbins, hereby demand judgment in their favor and against Plaintiff, Graphic Arts Mutual Insurance Company as to Plaintiff's Complaint.

#### **AFFIRMATIVE DEFENSES**

Answering defendants hereby incorporate by reference the Answer and Affirmative Defenses of Lower Merion School District, The Board of Directors of Lower

Merion School District and W. McGinley to Plaintiffs' Complaint for Declaratory Judgment.

Respectfully submitted,

LAMM RUBENSTONE LLC

Date: June 18, 2010

By: /s/  
Mark S. Haltzman, Esquire  
3600 Horizon Blvd., Suite 200  
Trevose, PA 19053  
215-638-9330

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**CERTIFICATE OF SERVICE**

I hereby certify that on the date written below the foregoing Answer of Blake J. Robbins, a minor, by his parents and natural guardians, Michael E. Robbins and Holly S. Robbins was filed electronically and is available for viewing and downloading from the ECF system, which also electronically served same on the following:

Arthur Makadon, Esquire  
Henry E. Hockeimer, Jr., Esquire  
Paul Lantieri, III, Esquire  
William B. Igoe, Esquire  
Ballard Spahr Andrews & Ingersoll, LLP  
Attorneys for **Defendants**

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Philadelphia, PA 19103  
Attorneys for Plaintiffs

Date: June 18, 2010

\_\_\_\_\_  
/s/  
Mark S. Haltzman, Esquire